



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

MAR 29 2017

CERTIFIED MAIL 7016 1970 0000 8992 6984
RETURN RECEIPT REQUESTED

Parker Hannifin Corporation
c/o: Mr. Scott R. Thistle
Cohen and Grigsby, P.C.
625 Liberty Avenue
Pittsburgh, Pennsylvania 15222-3152

Re: Supplemental Information Request Pursuant to Section 308 of the Clean Water Act, 33 U.S.C. § 1318, Parker Hannifin Corporation, 1620 Highway 6 East, Batesville, Panola County, Mississippi, Permit No.: MSP090042, issued by Mississippi Department of Environmental Quality

Dear Mr. Thistle:

Thank you for your client's correspondence dated January 29, 2016, containing information responding to the December 2, 2015 request by the U.S. Environmental Protection Agency, Region 4, pursuant to Section 308 of the Clean Water Act, 33 U.S.C. § 1318. This matter pertains to Parker Hannifin Corporation's facility (Facility) located at 1620 Highway 6 East in Batesville, Panola County, Mississippi, and its compliance with the requirements of Sections 301 and 307(d) of the Clean Water Act (CWA), 33 U.S.C. §§ 1311 and 1317(d); the regulations promulgated thereunder at 40 C.F.R. Parts 403 and 433; and the State of Mississippi pretreatment regulations at 11 Miss. Admin. Code Pt. 6, R. 1.1.4.M.; and Permit No. MSP090042 issued to the Facility by the State of Mississippi, effective May 2, 2011 and expiring April 30, 2016. In addition, the EPA appreciates the information provided during the Show Cause meeting held on January 13, 2017.

During the review of the Section 308 response and information from the Show Cause meeting, the EPA has determined that additional information is needed. The purpose of this letter is to request that Parker Hannifin Corporation respond to the enclosed Supplemental Information Request to supplement the information your client previously provided. Therefore, pursuant to Section 308 of the CWA, 33 U.S.C. § 1318, the EPA hereby requests that Parker Hannifin Corporation provide the information set forth in Enclosure A within 21 calendar days of your receipt of this letter.

Your client's response should be submitted to:

U.S. Environmental Protection Agency, Region 4
Water Protection Division - NPEB
Attn: Brad Ammons
61 Forsyth Street, S.W., Mailcode 9T25
Atlanta, Georgia 30303-8960

All information submitted must be accompanied by the following certification signed by a duly authorized company official in accordance with 40 C.F.R. § 403.12(l):

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Failure to provide a full and complete response to this information request or to adequately justify a failure to respond within the time frame specified above may result in an EPA enforcement action pursuant to federal law, including, but not limited to 33 U.S.C. § 1319 and 18 U.S.C. § 1001.

If Parker Hannifin Corporation believes that any of the requested information constitutes confidential business information, it may assert a confidentiality claim with respect to such information, except for effluent data. Further details, including how to make a business confidentiality claim, are found in Enclosure B.

If you have any questions or concerns, please contact Ms. Kavita Nagrani, Associate Regional Counsel, at (404) 562-9697.

Sincerely,



Denisse D. Diaz, Chief
NPDES Permitting and Enforcement Branch
Water Protection Division

Enclosures

cc: Mr. Tim Aultman
Mississippi Department of Environmental Quality

Mr. Matt Conner
Parker Hannifin Corporation

ENCLOSURE A

SUPPLEMENTAL INFORMATION REQUEST PURSUANT TO SECTION 308 OF THE CLEAN WATER ACT

Instructions

1. Identify the person(s) responding to this Information Request.
2. Please provide a separate narrative response to each and every Question and subpart of a Question set forth in this Information Request.
3. Precede each answer with the text and the number of the Question and its subpart to which the answer corresponds.
4. All documents submitted must contain a notation indicating the Question and subpart of the Question to which they are responsive.
5. In answering each Information Request Question and subpart thereto, identify all documents and persons consulted, examined or referred to in the preparation of each response, and provide true and accurate copies of all such documents.
6. If information not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, you must supplement your response to the EPA. Should you find at any time after the submission of your response that any portion of the submitted information is false or misrepresents the truth, you must notify the EPA as soon as possible.
7. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question to which it responds.
8. Where specific information has not been memorialized in a document, but is nonetheless responsive to a Question, you must respond to the Question with a written response.
9. If information responsive to this Information Request is not in your possession, custody or control, then identify the person from whom such information may be obtained.
10. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Question or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.
11. The EPA requests that all documents provided in an electronic format be compatible with pdf.
12. The EPA requests that all spreadsheet information be in an electronic format and compatible with MS Excel.

13. If any Question relates to activities undertaken by entities other than the recipient of this Information Request, and to the extent that you have information pertaining to such activities, provide such information for each entity.

Definitions

1. All terms not defined herein shall have their ordinary meanings, unless such terms are defined in the Clean Water Act or its implementing regulations, in which case the statutory or regulatory definitions shall control.
2. Words in the masculine may be construed in the feminine if appropriate, and vice versa, and words in the singular may be construed in the plural if appropriate, and vice versa, in the context of a particular question or questions.
3. The terms “And” and “Or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed outside its scope.
4. The term “Identify” means, with respect to a natural person, to set forth the person’s name, present or last known business address and business telephone number, present or last known home address and home telephone number, and present or last known job title, position or business.
5. The term “Identify” means, with respect to a document, to provide its customary business description; its date; its number, if any (invoice or purchase order number); the identity of the author, addressee and/or recipient; and substance of the subject matter.
6. The term “Identify” means, with respect to a corporation, partnership, business trust or other association or business entity (including a sole proprietorship), to set forth its full name, address, legal form (e.g., corporation, partnership, etc.), organization, if any, and a brief description of its business.
7. The term “Facility” means the Parker Hannifin Corporation facility located at 1620 Highway 6 East in Batesville, Panola County, Mississippi.
8. The term “State Indirect Discharge Permit,” “SID Permit” or “Permit” shall mean the Permit No. MSP090042, issued by State of Mississippi to Parker Hannifin Corporation effective May 2, 2011 and expiring April 30, 2016.
9. “Control Authority” shall have the meaning set forth in 40 C.F.R. § 403.3(f).

Questions

1. Please provide a summary of any metals testing of the cleaning line discharge after Technoclean use was halted at the Facility, and include the supporting sampling and lab analysis documents.
2. Did Parker Hannifin Corporation have any of the aluminum parts tested to see if any metal was removed by use of Technoclean? If so, what did the metallurgical test(s) show, and include the supporting sampling and lab analysis documents?
3. When did the newer machinery at the Facility first go online? This machinery was mentioned during the Show Cause meeting as being installed for efficiency and safety purposes and that may have resulted in fewer aluminum particles on the tubes being processed.
4. What records does Parker Hannifin Corporation have that can show the specific immersion time in the Technoclean tank at the Facility? It was stated during the Show Cause meeting that retention time was between 3 to 4.5 minutes; please provide any records supporting that statement.
5. It was stated during the Show Cause meeting that the account manager from Chemetall who provided Parker Hannifin Corporation with a letter relayed that he spoke with his chemists prior to sending Parker Hannifin Corporation the letter. Can he provide Parker Hannifin Corporation with any additional written materials supporting the sampling, analysis, or review that the chemists conducted to reach the conclusions stated in the letter? If so, please provide these documents.
6. Please provide temperature and pH records as they pertain to the Technoclean tank at the Facility. It was stated during the Show Cause meeting that the tank containing the Technoclean did not exceed an ambient temperature of 110 degrees F and that the pH in the tank was approximately 2 s.u. Does Parker Hannifin Corporation have documentation that can be provided for the relevant 3-year time period in support of these figures? If so, please provide.
7. The MDEQ inspection report noted that the Facility used to clean aluminum parts with Impoclean 3800 prior to using Technoclean. Can Parker Hannifin Corporation provide the exact dates during which Impoclean was being used at the Facility, including the periods both before and after use of the Technoclean ceased? If so, please provide.
8. The MDEQ inspection report noted that the Facility was originally listed as a categorical user for acid etching, but the categorical listing was removed from the permit in December 2001 due to the Facility's use of a different cleaning process when that designation applied. Can Parker Hannifin Corporation identify what cleaning process and specifically what chemical/solution was being employed during the time that the Facility was designated to be a categorical user?
9. Parker Hannifin Corporation has indicated that the annual aluminum levels found in Outfall 001 of the Permit dropped during the years that Technoclean was being employed at the Facility, showing the EPA annual data from 2006 – 2012. Can Parker Hannifin Corporation provide the monthly sampling data for these years?

10. Please provide information about any other facilities Parker Hannifin Corporation operates that employ, or employed, Technoclean on metallic materials, supply the timeframes it was used at each facility, and identify the permits associated with any Technoclean discharges or lack thereof.

ENCLOSURE B

RIGHT TO ASSERT BUSINESS CONFIDENTIALITY CLAIMS

(40 C.F.R. Part 2)

Except for effluent data, you may, if you desire, assert a business confidentiality claim as to any or all of the information that the EPA is requesting from you. The EPA regulation relating to business confidentiality claims is found at 40 C.F.R. Part 2.

If you assert such a claim for the requested information, the EPA will only disclose the information to the extent and under the procedures set out in the cited regulations. If no business confidentiality claim accompanies the information, the EPA may make the information available to the public without any further notice to you.

40 C.F.R. § 2.203(b). **Method and time of asserting business confidentiality claim.** A business which is submitting information to the EPA may assert a business confidentiality claim covering the information by placing on (or attaching to) the information, at the time it is submitted to the EPA, a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Allegedly confidential portions of otherwise non-confidential documents should be clearly identified by the business, and may be submitted separately to facilitate identification and handling by the EPA. If the business desires confidential treatment only until a certain date or until the occurrence of a certain event, the notice should so state.